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**VIA ELECTRONIC FILING**

The Honorable Stephanos Bibas  
James A. Byrne United States Courthouse  
601 Market Street  
Philadelphia, PA 19106

Re: Thomson Reuters Enterprise Centre GmbH et al. v. ROSS Intelligence Inc.,  
C.A. No. 20-613-SB

Dear Judge Bibas:

In anticipation of the Pretrial Conference in this matter, Defendant ROSS requests the opportunity to renew the following:

- ROSS's motion *in limine* to exclude evidence or testimony regarding Charles von Simson that was part of ROSS's July 2024 pretrial submission (D.I. 624 at Ex. 15-2); and
- ROSS's position regarding statutory damages, reflected in the *Daubert* regarding Malackowski (D.I. 274), which the Court held in abeyance. *See* D.I. 549 at 4. Since the filing of the motion and the Court's order, the Fifth Circuit has issued an opinion on statutory damages for a single compilation. *See Umg Recordings, Inc. v. Grande Commc'ns Networks, L.L.C.*, 118 F.4th 697, 723-24 (5th Cir. 2024).

ROSS informed Plaintiffs of their intention to raise these matters with the Court.

Respectfully,

/s/ David E. Moore

David E. Moore

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cc: Counsel of Record (via electronic mail)